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March 13, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On March 10, 2017, representatives from Video Relay Service (“VRS”) providers CSDVRS, LLC (“ZVRS”); Purple Communications, Inc. (“Purple”); ASL Service Holdings, LLC, dba GlobalVRS (“GlobalVRS”); and Convo Communications, LLC (“Convo”) (collectively, the “non-dominant VRS providers”) met with Amy Bender, Legal Advisor, Wireline, to Commissioner O’Rielly to discuss the above-referenced proceedings. Attending the meeting on behalf of the non-dominant VRS providers were Jeff Rosen, General Counsel for Convo; Angela Roth, President & CEO (via phone) for GlobalVRS, together with its consultant Andrew Isar (via phone); and Sherri Turpin, CEO (via phone), Michael Flanagan, CFO (via phone), and Gregory Hlibok, Chief Legal Officer for ZVRS and Purple, together with their counsel Gregory Simon.

The non-dominant VRS providers applauded the Commission’s draft Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order¹ and expressed appreciation that the draft item on circulation incorporates the non-dominant VRS providers’ joint rate proposal.² The non-dominant VRS providers emphasized that adoption of the proposed reforms would greatly benefit the deaf community, protect the long term stability of the TRS Fund, relieve pressure on contributors to the Fund, help smaller providers grow to scale, and promote competition for VRS. In particular, the non-dominant VRS providers’ four-year rate proposal would move each provider in the market closer to a reasonable operating margin, thereby helping the non-dominant providers remain in operation as planned competitive reforms are implemented. The non-dominant VRS providers also noted that the proposed rate tiers would result in an estimated total of \$14 million in savings to the TRS Fund in the first four years of its implementation.

¹ *Structures and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, FCC-CIRC1703-03, CG Docket Nos. 10-51 & 03-123 (Mar. 2, 2017).

² See ASL Services Holdings, LLC dba GlobalVRS, Convo Communications, LLC, CSDVRS, LLC dba ZVRS, Purple Communications, Inc., Video Relay Service (VRS) Rate Proposal, CG Docket Nos. 10-51 & 03-123 (filed Jan. 31, 2017).



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In response to questions about possible additions or changes to the draft item, the non-dominant VRS providers noted that non-compete clauses artificially restrict the already-limited pool of available Video Interpreters, and they encourage the Commission to prohibit such employment practices. However, the non-dominant VRS providers stressed the urgent need for VRS rate reform, and they ask the Commission not to make any changes to the draft item that would delay adoption of a rate reform Order past June 30, 2017, the end of the current rate year.

Respectfully submitted,

/s/_____

Gregory Hlibok

cc: Amy Bender